

ATTORNEYS AT LAW

485 LEXINGTON AVENUE
28th FLOOR
New York, NY 10017
(212) 973-3406
Fax No. (212) 972-9432

MEGAN WOLFE BENETT

www.kreindler.com
mbenett@kreindler.com

September 17, 2021

Via ECF/CM

Hon. John P. Cronan
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Jamarri Reid*, 21 Cr. 174 (S.D.N.Y.) (JPC)

Dear Judge Cronan:

I represent Jamarri Reid, defendant in the above-captioned prosecution, whose sentencing is currently scheduled for October 4, 2021. Immediately following Mr. Reid's change of plea proceeding, on July 2, 2021, I inquired with four separate mitigation teams regarding their availability to assist on the sentencing aspects of this case. At the time, none were available. I subsequently embarked on several interviews with family members, identifying the organizations that might have information relevant to Mr. Reid's history and characteristics. As the Court knows, I then obtained subpoenas for nine different entities, which were all served within two days of receipt. Since serving those subpoenas, only two organizations have produced materials and we are now in the process of following up with the others. Because, however, I have not been able to obtain the records that I believe will bear directly on Mr. Reid's social, family, educational and health history – all of which will, in turn, bear on the analysis of his history and characteristics under 18 U.S.C. § 3553(a) – I respectfully request that this Court adjourn Mr. Reid's sentencing.

Additionally, one of the previously-unavailable mitigation specialists advised me today that she could work on Mr. Reid's case, provided the sentencing takes place in January or sometime thereafter, which time is necessary given the ongoing delays and impediments to accessing individuals detained in the Bureau of Prisons as well as the challenges of meeting family, friends and other relevant individuals in person when conducting collateral interviews. In light of the Probation Department's calculation of the Sentencing Guidelines, it is in Mr. Reid's best interest to adjourn the sentencing so as to allow a mitigation specialist to assist in preparing the defense submissions, as will be set forth in the request for that expert's services.

September 17, 2021

Page 2 of 2

Accordingly, I respectfully request that this Court adjourn Mr. Reid's sentencing from October 4, 2021 until a date on or after January 15, 2022 (noting that I am not available January 26-30, February 10 or February 21-25). This is the first request for an adjournment and the government has advised that they do not object to the request.

Respectfully submitted,



Megan W. Bennett
Counsel for Jamarri Reid

The sentencing for Jamarri Reid scheduled for October 4, 2021 is adjourned to January 25, 2021 at 10:00 a.m., contingent on the ability of the jail and the Marshals Service to facilitate the defendant's transportation to the courthouse at that date and time. The Court will confirm with the parties closer to the scheduled date.

SO ORDERED.

Date: September 20, 2021
New York, New York



JOHN P. CRONAN
United States District Judge